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May 19, 2021

*Via ECF*

Magistrate Judge Andrew E. Krause  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**Re: Rutherford, et al. v. City of Mount Vernon, et al.  
18-CV-10706 (LMS)**

Dear Magistrate Judge Krause,

As the Court is aware, the undersigned and The Quinn Law Firm PLLC represent the City of Mount Vernon and the individually named Defendants in the above-referenced matter.

The parties jointly write to update the Court on the status of discovery in anticipation of the Status Conference scheduled for May 20, 2021 at 1:30 p.m. As an initial matter, Plaintiffs served their initial Request for Production of Documents on April 14, 2021, with Defendants' consent. In the interim, the parties have met and conferred and Plaintiff has consented to an extension of Defendants' deadline to respond to May 28, 2021.

The parties also write to inform the Court that they have come to an agreement in principle regarding the issue of disciplinary records and are conferring on a proposed confidentiality stipulation to govern the production. Accordingly, the parties do not anticipate requiring motion practice on the issue of disciplinary and personnel records at this time.

We thank the Court for its time and attention to these matters.

Respectfully submitted,

*Steven J. Bushnell*

Steven J. Bushnell, Esq.

cc: Karen Newirth, Esq. *via ECF*  
Attorney for Plaintiffs